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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 203)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.
8 203) filed in connection with Sonos’s Reply Claim Construction Brief (“Reply Brief”) (Dkt. No.
9 202). If called as a witness, I could and would testify competently to the information contained
10 herein.

11 3. Google seeks an order sealing the materials as listed below:

12 Document	13 Portions Sonos Sought to Be Filed Under Seal	14 Portions Google Seeks to Be Filed Under Seal	15 Designating Party
16 Exhibit 24 to Reply Brief (“Exhibit 24”)	Entire Document	Portions outlined in red boxes	Google

17 4. I understand that the Court analyzes sealing requests in connection with claim
18 construction briefs pursuant to the “good cause” standard for non-dispositive motions. *See, e.g.,*
19 *Space Data Corp. v. Alphabet Inc.*, No. 16-CV-03260-BLF, 2018 WL 10454863, at *2 (N.D. Cal. July
20 16, 2018) (“Since the sealing request relates to a non-dispositive claim construction brief, the ‘good
21 cause’ standard for sealing applies.”) (quoting *Symantec Corp. v. Acronis, Inc.*, No. 12-CV-05331-
22 JST, 2013 WL 5913756, at *2 (N.D. Cal. Oct. 31, 2013)).

23 5. The portions of Exhibit 24 outlined in red boxes contain references to Google’s
24 confidential business information and trade secrets, including details regarding source code,
25 architecture, and technical operation of Google’s products. The specifics of how these functionalities
26 operate is confidential information that Google does not share publicly. Thus, I understand that the
27 public disclosure of such information could lead to competitive harm to Google, as competitors could
28 use these details regarding the architecture and functionality of Google’s products to gain a

1 competitive advantage in the marketplace with respect to their competing products. A less restrictive
2 alternative than sealing would not be sufficient because the information sought to be sealed is
3 Google's confidential business information and trade secrets but has been utilized by Sonos in support
4 of Sonos's Reply Brief.

5 I declare under penalty of perjury under the laws of the United States of America that to the
6 best of my knowledge the foregoing is true and correct. Executed on April 18, 2022, in San
7 Francisco, California.

8 DATED: April 18, 2022

9 By: /s/ Jocelyn Ma
10 Jocelyn Ma
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